

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC,

Plaintiff,

v.

MICHAEL MOST,

Defendant.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC,

Plaintiff,

v.

MARJORIE MOST,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04941 (SMB)

Adv. Pro. No. 10-04947 (SMB)

**DECLARATION OF SARAH JANE T.C. TRUONG IN SUPPORT OF THE
TRUSTEE'S OPPOSITION TO DEFENDANTS' APPLICATIONS BY WAY OF ORDER
TO SHOW CAUSE SEEKING ENTRY OF AN ORDER QUASHING THE SUBPOENAS
ISSUED BY PLAINTIFF AND GRANTING A PROTECTIVE ORDER**

I, Sarah Jane T.C. Truong, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney admitted to the bar of this Court and an associate at the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, Esq., trustee ("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa et seq. ("SIPA"), and for Bernard L. Madoff ("Madoff") (collectively, "Debtor").

2. I make this Declaration to transmit to the Court a true and correct copy of a document in connection with the Trustee's Opposition to Defendants' Applications By Way of Order to Show Cause Seeking Entry of an Order Quashing the Subpoenas Issued by Plaintiff and Granting a Protective Order.

3. Attached hereto as Exhibit 1 is a true and correct copy of an email I sent to Ms. Warmuth on May 6, 2014.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 12, 2014
New York, New York

/s/ Sarah Jane T.C. Truong

Sarah Jane T.C. Truong
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*Attorneys for Irving H. Picard, Esq.,
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*